

## Vitellaro, Chandra

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**From:** McClintock, Katie  
**Sent:** Saturday, March 05, 2016 10:19 PM  
**To:** 'Steve Van Slyke'; 'gerryp@pscleanair.org'  
**Subject:** Ardagh and 6S compliance

Steve and Gerry –

I'd like to ask a few questions about Ardagh and I wasn't sure who should get the questions so I am sending to both of you. One is very pressing and I'd like to discuss as soon as possible and figure out next steps.

Steve sent me some documents on Ardagh's compliance with 6S and I was reviewing the tests today and came up with a few minor questions and some major ones:

**Major:** Ardagh is reporting lead and chromium emissions to TRI. It is reporting more lead than chromium. However it claimed in its initial notification to you that it does not use lead to make glass (only chromium and then conducted only chromium tests for 6s compliance). I am curious where the lead emissions are from. They also reported some of it sent offsite from a scrubber (about 22%) which would be consistent with Furnace 5. **Have you looked into whether they add lead as a raw material?** If so then they need to test for these as well to demonstrate compliance with 6S. It is looking like most container plants are reporting lead emissions, fyi.

**Minor:**

1. It looks like they submitted the process data separately (since cbi). If I remember correctly their operational pages included batch recipe data. If so, can I get a copy of that? I assume you would have to mail or fax it? I'd like it for all the 6S test and if you have any handy for the other recent tests that would be good as well to see if the batch formulas changed between the tests and the non-tests (though if they made a different color for each it would change). **This would be a good place to check for lead usage as well, if they include the metal oxides in the recipe.**
2. It looks like you requests daily operational data before and after their 6S compliance tests. Did you determine that the conditions during the test were representative?
3. I got the repeat 6S test on furnace 3 and the PSCAA review of the 2009 tests but do you happen to have the pdfs for the 2009 test reports that you could send to me?

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